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T.R.A. DOCKET ROOM

October 27, 2003

Honorable Deborah Taylor Tate  
Chairman  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505


Re: Implementation of the Federal Communications Commission's Triennial  
Review Order-9 Month Proceeding-Switching  
Docket No. 03-00491

Dear Chairman Tate:

Enclosed please find the original and fourteen (14) copies of CompSouth's First Set of Interrogatories to BellSouth Telecommunications Inc. in the above-captioned proceeding.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:   
Henry Walker

HW/nl  
c: Guy Hicks, BellSouth Telecommunications, Inc.

**BEFORE THE TENNESSEE REGULATORY AUTHORITY**

**NASHVILLE, TENNESSEE**

**October 27, 2003**

IN RE:

IMPLEMENTATION OF THE FEDERAL	)	
COMMUNICATIONS COMMISSION'S	)	DOCKET NO.
TRIENNIAL REVIEW ORDER – 9 MONTH	)	03-00491
PROCEEDING – SWITCHING	)	

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**COMPSOUTH'S FIRST SET OF INTERROGATORIES  
TO BELL SOUTH TELECOMMUNICATIONS, INC.**

Competitive Carriers of the South, Inc.<sup>1</sup>("COMPSOUTH"), pursuant to the Tennessee Regulatory Authority's Procedural Schedule, hereby serves its First Set of Interrogatories to BellSouth Telecommunications, Inc. ("BellSouth").

**DEFINITIONS**

1. "BellSouth" means BellSouth Telecommunications, Inc., and its parents, subsidiaries, and affiliates, their present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of BellSouth Telecommunications, Inc.

2. The terms "you" and "your" refer to BellSouth.

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<sup>1</sup> The members of CompSouth include: Access Integrated Networks, Inc. MCI, Birch Telecom, Business Telecom, Inc., Covad Communications Company, AT&T, NewSouth Communications Corp., Talk America, Nuvox Communications, Inc., ITC^DeltaCom, Xspedius Communications, Momentum Business Solutions, Cnergy Communications Company, Network Telephone corp., KMC Telecom, Z-Tel Communications, Inc., and IDS Telcom LLC.

3. "CLEC" means a "competitive local exchange carrier," as defined in 47 U.S.C. § 153(26), which is not an "incumbent local exchange carrier" as defined in 47 U.S.C. § 251(h).

4. The term "person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

5. The term "document" shall have the broadest possible meaning under applicable law. "Document" means every writing or record of every type and description that is in the possession, custody or control of BellSouth, including, but not limited to, correspondence, memoranda, drafts, workpapers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail files; and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" further includes, by way of illustration and not limitation, schedules, progress schedules, time logs, drawings, computer disks, charts, projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.

6. The term "communication" means any oral, graphic, demonstrative, telephonic, verbal, electronic, written or other conveyance of information, including, but not limited to, conversations, telecommunications and documents.

7. The term "referring or relating to" means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

8. "And" and "or" as used herein shall be construed both conjunctively and disjunctively and each shall include the other whenever such construction will serve to bring within the scope of these discovery requests any information that would otherwise not be brought within their scope.

9. "Affiliate" or "affiliated" means an entity that directly, or indirectly through one or more intermediaries, controls, or is controlled by, or is under common control with, another entity.

10. The singular as used herein shall include the plural, and vice versa, and the masculine gender shall include the feminine and the neuter.

11. "Identify" or "identifying" or "identification" when used in reference to a natural person means to state:

- a) the full legal name of the person;
- b) the name, title and employer of the person at the time in question;
- c) the present or last known employer of such person;
- d) the present or last known home and business addresses of the person; and
- e) the present home address.

12. "Identify" or "identifying" or "identification" when used in reference to a person other than a natural person means to state:

- a) the full name of the person and any names under which it conducts business;
- b) the present or last known address of the person; and
- c) the present or last known telephone number of the person.

13. "Identify" or "identifying" or "identification" when used in reference to a document means to provide with respect to each document requested to be identified by these discovery requests a description of the document that is sufficient for purposes of a request to produce or a subpoena duces tecum, including the following:

- a) the type of document (e.g., letter, memorandum, etc.);
- b) the date of the document;
- c) the title or label of the document;
- d) the Bates number or other identifier used to number the document for use in litigation;
- e) the identity of the originator;
- f) the identity of each person to whom it was sent;
- g) the identity of each person to whom a copy or copies were sent;
- h) a summary of the contents of the document;
- i) the name and last known address of each person who presently has possession, custody or control of the document; and
- j) if any such document was, but is no longer, in your possession, custody or control or is no longer in existence, state whether it: (1) is missing or lost; (2) has been destroyed; or (3) has been transferred voluntarily or involuntarily, and, if so, state the

circumstances surrounding the authorization for each such disposition and the date of such disposition.

14. "Identify," "identifying" or "identity" when used in reference to a communication means to state the date of the communication, whether the communication was written or oral, the identity of all parties and witnesses to the communication, the substance of what was said and/or transpired and, if written, the identity of the document(s) containing or referring to the communication.

15. "Access Line" refers to a working analogue voice grade access line used to serve residential and small business customers, or a working voice grade line served by Digital Loop Carrier Systems ("DLC") that is used for serving residential and small business customers. "Access Line" does not, for example, include high capacity systems such as DS1 and ISDN-PRI.

16. Digital Loop Carrier ("DLC") includes IDLC (integrated) UDLC (Universal) and NGDLC (Next Generation).

17. "ILEC" refers to Incumbent Local Exchange Carrier.

18. "CLLI code" refers to Common Language Location Identifier.

19. "CO" refers to Central Office.

20. "Coordinated cut over" refers to coordination of the loop migration from the ILEC switch to the CLEC switch.

21. "Coordinated time-specific cut over" refers to coordination of the loop migration from the ILEC switch to the CLEC switch at a time specified by the CLEC and agreed to by the ILEC.

22. "CWINS" refers to Customer Wholesale Interconnection Services.

23. "DSO" refers to Digital Signal, level zero.
24. "FCC" refers to the Federal Communications Commission.
25. "LCSC" refers to Local Carrier Service Center.
26. "LSR" refers to Local Service Request.
27. "MDF" refers to Main Distribution Frame.
28. "OSS" refers to Operational Support Systems.
29. "PIC" refers to Primary Interexchange Carrier.
30. "SEEM" refers to Self Effectuating Enforcement Mechanism.
31. "UNE" refers to Unbundled Network Element.
32. "UNE-L" refers to Unbundled Network Element-Loop.
33. "UNE-P" refers to Unbundled Network Element –Platform.
34. "LIDB" refers to Line Information Database.
35. "MSA" refers to Metropolitan Statistical Area.
36. "LATA" refers to Local Access and Transport Area.
37. Unless otherwise stated, information requests refer to BellSouth's nine-state region.

### **GENERAL INSTRUCTIONS**

1. If you contend that any response to any Interrogatory may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:

- a) the privilege asserted and its basis;

- b) the nature of the information withheld; and
- c) the subject matter of the document, except to the extent that you claim it is privileged.

2. These discovery requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These discovery requests are intended to include requests for information, which is physically within your possession, custody or control as well as in the possession, custody or control of your agents, attorneys, or other third parties from which such documents may be obtained.

3. If any Interrogatory cannot be answered in full, answer to the extent possible and specify the reasons for your inability to answer fully.

4. These interrogatories are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these interrogatories subsequently become known.

5. For each Interrogatory, provide the name of the company witness(es) or employee(s) responsible for compiling and providing the information contained in each answer.

6. To the extent BellSouth has previously provided a response to any Interrogatory, which prior response is responsive to any of the following Interrogatories, in BellSouth's nine-state region or any other state in proceedings in which BellSouth and COMPSOUTH are parties, BellSouth need not respond to such Interrogatory again, but rather may respond to such Interrogatory by identifying the prior response to such Interrogatory by state, proceeding, docket number, date of response, and the number of



such response. If such prior response does not respond to the Interrogatory contained below in its entirety, you should provide all additional information necessary to make your answers to these Interrogatories complete.

## INTERROGATORIES

1. For each wire center, please provide the following information for the wire center:
  - a. The UNE pricing zone.
  - b. The Special Access Zone Density Pricing zone.
  - c. The MSA the wire center predominately serves.
  - d. The LATA
  - e. Identify whether BellSouth enjoys special access pricing flexibility for that wire center.
2. For each wire center, please provide the number of loops, by type listed below, provisioned to CLECs in the past 3 months:
  - a. UNE analog loop;
  - b. UNE DS-1 loop;
  - c. Analog special access;
  - d. DS-1 special access;
  - e. UNE-P (residential);
  - f. UNE-P (business);
  - g. Other
3. For each wire center, please provide the number of loops, by type listed below, provisioned to CLECs in the past 6 months:
  - a. UNE analog loop;
  - b. UNE DS-1 loop;
  - c. Analog special access;
  - d. DS-1 special access;
  - e. UNE-P (residential);
  - f. UNE-P (business);
  - g. Other
4. For each wire center, please provide the number of loops, by type listed below, provisioned to CLECs in the past 12months:
  - a. UNE analog loop;
  - b. UNE DS-1 loop;
  - c. Analog special access;
  - d. DS-1 special access;
  - e. UNE-P (residential);

- f. UNE-P (business);
  - g. Other
5. For each wire center, for the most recent quarter for which the information is available, please provide the number of switched access lines, separately for
  - a. Business analog lines
  - b. Residential analog lines.
  - c. Business digital lines (measured in voice grade equivalents).
  - d. Please identify the conversion factors used in (c) above.
6. For each wire center, for the most recent quarter for which the information is available, please provide the number of special access lines provided to end-users (i.e., not provided to CLECs), separately between:
  - a. DS-1 special access lines;
  - b. DS-3 special access lines.
7. Provide the number of EELs in service at the end of the most recent quarter for which such information is available, stated separately for:
  - a. EELs comprised of analog loops that are connected to analog transport.
  - b. EELs comprised of analog loops that are multiplexed onto higher speed (DS-1 or higher) transport.
  - c. EELs comprised of DS-1 loops that are connected to DS-1 transport
  - d. EELs comprised of DS-1 loops that are multiplexed onto DS-3 or higher transport.
8. For the last quarter for which such information is available, provide by end-office (by applicable CLLI code):
  - a. The CLLI of the tandem switch on which the end-office homes.
  - b. For the same period as the information provided in the previous question, please indicate whether you have enough end office and tandem switch ports available for each wire center to handle the traffic if all UNE-P lines were moved to CLEC switches?
9. Provide the number of EEL local connections, in DS-1 equivalents, by wire center for each quarter since the fourth quarter of 1999.
10. With regard to business customers using 24 or fewer analog lines, identify the number of customer locations by the number of switched local service lines in the following table:

<b>Lines</b>	<b>Number of Customer Locations</b>
1	
2	
3	
4	

5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
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21	
22	
23	
24	

11. For the last quarter for which such information is available, provide by end-office (by applicable CLLI code):
  - a. The CLLI of the tandem switch on which the end-office homes.
  - b. The number of shared transport (i.e. transport used in conjunction with unbundled local switching) minutes originating from the end-office.
  - c. The number of shared transport minutes terminating to the end-office.
12. For the same period as the information provided in the previous question, please provide:
  - a. The total number of interconnection trunks and interconnection minutes at each tandem, separated between:
    - i. Originating trunks and the minutes carried by those trunks,
    - ii. Terminating trunks and the minutes carried by those trunks,
    - iii. Two-ways trunks and the minutes carried by those trunks.
  - b. The total number of interconnection trunks and interconnection minutes at each end-office (by applicable CLLI code), separated between:
    - i. Originating trunks and the minutes carried by those trunks,
    - ii. Terminating trunks and the minutes carried by those trunks,
    - iii. Two-ways trunks and the minutes carried by those trunks.
  - c. The number of additional trunk terminations available on each tandem.
  - d. The number of additional trunk terminations available on each end-office.

13. Provide the number of loops, by calendar year and by central office (by applicable CLLI code), that are served by:
  - a. IDLC arrangements.
  - b. NGDLC arrangements
  - c. UDLC arrangements
  - d. Of the IDLC loops, please state how many loops are transferable to universal digital loop carrier (UDLC) without additional construction.
14. Provide a forecast for the next five years, or the longest available forecast if a five-year forecast is not available, identifying the number of loops that you intend to serve via:
  - a. IDLC loop arrangements.
  - b. NGDLC loop arrangements.
15. Provide the number, for the most recent time period for which data is available, of UNE loops served by IDLC and NGDLC arrangements that have been provided to a CLEC:
  - a. With unbundled local switching.
  - b. Without unbundled local switching.
16. Please state the applicable charges, if any, and the amount of time it takes to transfer a customer's IDLC loop to
  - a. UDLC
  - b. spare copper.
17. During the past 5 years, has [ILEC] ever added processor capacity or peripheral equipment to one or more of its local switches due to:
  - a. Increased usage.
  - b. Exhaust of the number of end-user lines that could be connected to the switch.
18. If the answer to either part of the previous question above is yes, please identify:
  - a. The nature of the upgrade performed.
  - b. Whether [ILEC] had other end-office switches within a 15-mile radius with capacity to handle additional lines
  - c. If the answer to b. is yes, whether [ILEC] considered off-loading subscriber lines from the switch requiring the upgrade, and serving those lines from a different local switch. If [ILEC] did not consider doing so, why not?

Respectfully submitted,

ATTORNEY FOR COMPSOUTH, INC  
BOULT, CUMMINGS, CONNERS & BERRY, PLC

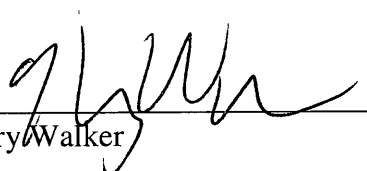
A handwritten signature in dark ink, appearing to read 'H. Walker', is written over a horizontal line.

Henry Walker  
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Nashville, Tennessee 37219  
(615) 252-2363

**CERTIFICATE OF SERVICE**

I hereby certify that on October 27, 2003, a copy of the foregoing document was served on the parties of record, via US mail:

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Henry Walker